

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RALPH S. JANVEY, IN HIS CAPACITY AS
COURT-APPOINTED RECEIVER FOR THE
STANFORD INTERNATIONAL BANK, LTD.,
ET AL.,

Plaintiff,

v.

and JAMES R. ALGUIRE, ET AL.,

Defendants.

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CASE NO. 3:09-CV-0724-N

**DEFENDANT CHRISTOPHER THOMAS' JOINDER IN 116 FORMER STANFORD
EMPLOYEES' MOTION TO DISMISS AND MOTION TO COMPEL ARBITRATION**

Defendant Christopher Thomas ("Thomas") hereby moves to dismiss the Receiver's claims against him or, in the alternative, to compel arbitration. Thomas raises no new issues of law, but incorporates, by reference and for all purposes, the briefing submitted by 116 Former Stanford Employees in support of their Motion to Dismiss and Motion to Compel Arbitration (Docket Nos. 201 (Brief in Support of Motion to Compel and Dismiss) and 364 (Reply in Support of Motion to Compel and Dismiss)). Like the other 116 moving defendants, Thomas is a former Stanford Group Company ("SGC") financial advisor from whom the Receiver seeks to recover compensation that Thomas received from SGC. Docket No. 156 at ¶¶ 49-51. For the reasons set forth in Docket Nos. 201 and 364, the Receiver is obligated to arbitrate all claims against Thomas pursuant to FINRA rules. Furthermore, part of the compensation that the Receiver seeks from Thomas is an Employee Forgivable Loan, the terms of which include a mandatory arbitration provision. Thomas Declaration at ¶ 3.

For the reasons set forth in the above-referenced briefing, Defendant Thomas moves the Court for an Order compelling arbitration of all of the claims that the Receiver asserts against

him. In the alternative, Thomas requests an Order dismissing all of the Receiver's claims against him under Federal Rules of Civil Procedure 9(b) and 12(b)(6) and all other relief to which he may be entitled.

Respectfully submitted,

s/ Bradley W. Foster
Bradley W. Foster
Texas State Bar No. 07283200
bradfoster@andrewskurth.com
Matthew G. Nielsen
Texas State Bar No. 24032792
matthewnielsen@andrewskurth.com

Andrews Kurth LLP
1717 Main Street, Suite 3700
Dallas, Texas 75201
Telephone: (214) 659-4400
Facsimile: (214) 659-4401

ATTORNEYS FOR 118 FORMER
STANFORD EMPLOYEES¹

¹ Jim Alguire, Orlando Amaya, Victoria Anctil, Tiffany Angelle, Sylvia Aquino, George Arnold, Mike Arthur, Donal Bahrenburg, Brown Baine, Stephen Barber, John Barrack, Andrea Berger (Freedman), Norman Blake, Michael Bober, Nigel Bowman, Alexandre Braune, Charles Lee Brickey, Nancy Brownlee, George Cairnes, Frank Carpin, Scott Chaisson, Neal Clement, Chris Collier, Jay Comeaux, Michael Conrad, John Cravens, Patrick Cruickshank, Greg Day, Bill Decker, Mike DeGolier, Arturo Diaz, Matt Drews, Tom Espy, Jason Fair, Evan Farrell, Roger Fuller, Attlee Gaal, Gregg Gelber, Steven Glasgow, John Glennon, Ward Good, Stephen Greenhaw, Billy Ray Gross, Patricia Herr, John Mark Holliday, Charles Hughes, Wiley Carter Hutchins, Jr., David Innes, Allen Johnson, Bruce Lang, Jim LeBaron, Bill Leighton, Robert (Bobby) Lenoir, Trevor Ling, Chris Long, Robert Long, Humberto Lopez, Michael Macdonald, Maria Manerba, Mike Mansur, Bert "Deems" May, Doug McDaniel, Matt McDaniel, Pamela McGowan, Lawrence Messina, Bill Metzinger, Trent Miller, Peter Montalbano, David Morgan, Jonathan Mote, Carroll Mullis, Jon Nee, Aaron Nelson, Norbert Nieuw, Scott Notowich, Monica Novitsky, Bill Peerman, Saraminta Perez, Randy Pickett, Edward Prieto, Christopher Prindle, Andrew Pritsios, Judith Quinones, Sumeet Rai, Michael Ralby, Leonor Ramirez, Nelson Ramirez, Steven Restifo, Jeff Ricks, Alan Riffle, Steve Robinson, Eddie Rollins, Rocky Roys, John Santi, Bill Scott, Haygood Seawell, Leonard Seawell IV, Doug Shaw, Paul Stanley, Sandy Steinberg, David Heath Stephens, William O. Stone, Jr., Paula Sutton, Brent Sutton, Scot Thigpen, Christopher Thomas, Jose Torres, Al Trullenque, Audrey Truman, Tim Vanderver, Pete Vargas, Ed Ventrice, Maria Villanueva, Charles Vollmer, Bill Whitaker, Donald Whitley, Hunter Widener, and Tom Woolsey.

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2010, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic case files system sent a “Notice of Electronic Filing” to all counsel of records, each of whom have consented in writing to accept this Notice as service of this document by Electronic means.

s/ Bradley W. Foster
Bradley W. Foster